

Shelter's response to Fair Play:

**A consultation on the play
strategy. A commitment in
The Children's Plan**

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Shelter

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Shelter is a national campaigning charity that provides practical advice, support and innovative services to over 170,000 homeless or badly housed people a year. This work gives us direct experience of the various problems caused by the shortage of affordable housing across all tenures. Our services include:

- A national network of over 20 housing aid centres
- Shelter's free housing advice helpline which runs from 8am-midnight
- Shelter's website which provides housing advice online
- The Government-funded National Homelessness Advice Service, which provides specialist housing advice, training, consultancy, referral and information to other voluntary agencies, such as Citizens Advice Bureaux and members of Advice UK, which are approached by people seeking housing advice
- A number of specialist projects promoting innovative solutions to particular homelessness and housing problems. These include 'Homeless to Home' schemes, which work with formerly homeless families, and the Shelter Inclusion Project, which works with families, couples and single people who are alleged to have been involved in anti-social behavior. The aim of these particular projects is to sustain tenancies and ensure people live successfully in the community.
- We also campaign for new laws and policies - as well as more investment - to improve the lives of homeless and badly housed people, now and in the future.

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Please tick if you want us to keep your response confidential.

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Please mark an X in the box below that best describes you as a respondent.

<input type="checkbox"/> Local Authority	<input checked="" type="checkbox"/> Charity	<input type="checkbox"/> Young Person
<input type="checkbox"/> Volunteer working with Children	<input type="checkbox"/> National / Commercial Organisation	<input type="checkbox"/> Parent
<input type="checkbox"/> Professional working with children	<input type="checkbox"/> Professional Association	<input type="checkbox"/> Health Authority
<input type="checkbox"/> School	<input type="checkbox"/> Play Organisation	<input type="checkbox"/> Other (Please Specify)

Please Specify:

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1 Is this the right national vision and set of aims for play in England?

Yes

No

Not Sure

Comments:

Shelter welcomes that the national vision for the fair play strategy has recognised that strong vibrant communities are an important part of ensuring that children and young people have a variety of places to play and an active involvement in play design and decision-making. It is vital children and young people are able to access suitable and safe places to play that are near their homes. In particular aims (a) and (b) recognise this by setting out:

- In every residential area, there should be a variety of places for play, free of charge, supervised and unsupervised;
- Local neighbourhoods should be, and feel like, safe, interesting places to play.

However, it is important that the right tools are used to implement these aims and goals. Chapter 5 sets out the need for DCSF and DCMS to work jointly with CLG to ensure that the national vision for play is achieved. Shelter feels that currently there is a lack of integration between government departments concerning the needs of children and young people particularly in relation to housing and communities. Shelter research¹ carried out in 2007 examined how the Every Child Matters (ECM) agenda is working in practice for homeless and badly housed children. The work found that over a third of respondents said their housing departments were not involved in their local Children's Trust. Further, over a quarter (28%) of postal survey respondents said their staff had not received appropriate training on the ECM agenda. Shelter would like to stress the need for cross-government departmental working arrangements to ensure the national vision for play is effectively delivered and filters down to housing, planning and children's professionals.

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2 Are the areas we have identified for action right? What other areas could be considered and what more could we do?

Yes No Not Sure

Comments:

3 Who is responsible for helping children to play, and what are they responsible for?

Comments:
We do not intend to answer this question.

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4 How can schools best support play, both for their pupils and for their local communities?

Comments:

We are not intend to answer this question.

5 What more could be done and in what settings to support disabled children to be able to play?

Comments:

Recent government policies (such as *Improving the Life Chances of Disabled People*ⁱⁱ) have emphasised the need to improve the quality of disabled children's lives in general by including them in mainstream activitiesⁱⁱⁱ. However, research has shown that disabled children and their families are still experiencing severe social and economic disadvantage and are often socially excluded from mainstream society and services^{iv}. For example, studies by Contact a Family^v and the Institute of Education^{vi} have revealed that families with disabled children experience negative attitudes towards them when using leisure and play facilities. They also reported a shortage of appropriate and accessible information and services, such as rigid rules and regulation and lack of changing facilities.

As discussed further in question 6, there is link between living in bad housing and a poor surrounding neighbourhood. Disabled children are less likely than other groups of disabled people to be living in suitable housing, and less well housed than other families with children even those on similar incomes^{vii}. Such families are more likely to live in unsuitable neighbourhoods that are unsafe for children to play in and short of accessible outdoor play areas.

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In addition to the requirement for local authorities receiving play capital funding to develop play areas to make these accessible to disabled children, Shelter suggests the following recommendations to support children with disabilities to be able to play:

- Ensure that the location of these play areas are accessible for disabled children and located in a variety of neighbourhoods.
- Appropriate access should be ensured through the use of ramps and other facilities.

6 Are there groups of children who do not have opportunities to play and what could be done to help them?

Yes

No

Not Sure

Comments:

As the consultation outlines, the Government wants places to play to be attractive, welcoming, engaging and accessible to children from minority groups in the community (aim (h), p.7). In addition to disabled children, Shelter feel that the following groups of children are also particularly vulnerable in having few or no opportunity to play:

Children living in bad housing

There are 1.6 million in Britain children living in bad housing in England. Bad housing does not just refer to homelessness but also children living in temporary accommodation, overcrowded conditions^{viii}, insecurity, housing in poor physical condition and living in deprived neighbourhoods^{ix}. Where homes are poor quality, neighbourhoods are more likely to suffer from social problems and a lack of access to services. Residents living in the 10% most deprived areas in England were more likely to report social problems (such as noise, vandalism, drugs, litter and racial harassment) in comparison to residents in less deprived areas^x.

Shelter believes there are problems with play opportunities that are specifically linked to bad housing and poor neighbourhoods. These areas are more likely to be unsuitable or unsafe for children to play in. Shelter research, *Home truths* found that families with children want outside spaces where children can play safely^{xi}. Further research carried out by Shelter, *Against the odds*, found that the majority of children interviewed (14 out of 20 - all of whom lived in bad housing) did not have any outside

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space to play in at their home. When living in overcrowded and unfit housing having space to play outside becomes even more crucial. Children in this study also referred to playing in unsuitable and even dangerous places in the absence of a decent public space. The researcher also observed that on the day of the interview the corridor was full of flies. A further report, *Full house?* found that 63 percent of overcrowded families interviewed said they did not have access to a safe outside play area for their children and this magnified the impact of overcrowding. The lack of access to outside space exacerbated health problems and increased the level of accidents among overcrowded families.

The *Fair play* consultation states that play is central to all the Every Child Matters outcomes (p.6). Factors resulting from bad housing such as poor health, increased risk of childhood accidents, lower achievement, behavioural problems and being trapped in poverty^{xii} can prevent children from successfully engaging in play.

Children from hard-to-reach groups

Gypsy and traveller children: The gypsy and traveller sites that exist are often located next to main roads with no play space and few facilities^{xiii}. Shelter research^{xiv}, examining housed gypsy and travellers, found that children from these families were discriminated against by their neighbours because of their ethnic background. One participant talked about how neighbours prevented their children from playing with gypsy and traveller children by bringing them inside or telling them not to mix with them.

Children from black and minority ethnic groups: Shelter research on overcrowding, *Full house?* confirms that overcrowding disproportionately affects black and minority ethnic communities. Research from the State of London's Children Report found that there are clear inequalities in access to play in London, and that this disproportionately affects black and minority ethnic children^{xv}.

We suggest the following recommendations to help these groups:

- Free and accessible facilities and activities for children living in bad housing and deprived neighbourhoods.
- Public spaces and parks need to be better maintained, safe and child-friendly.
- Engagement with communities to promote more tolerant behaviour towards gypsy and traveller children.
- Engagement with BME communities to raise awareness of the play facilities

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available to children and ensure more access for these groups.

- Children's centres have been highlighted in the consultation as presenting a range of opportunities for play for young children. Shelter has written a good practice briefing for children's centres in engaging with homeless children^{xvi}. Given the relationship highlighted above between bad housing and barriers to play we suggest:
 - That links are maintained between the family and the centre when families move into more settled accommodation, to ensure that the family continues to receive appropriate support.
 - Children's centres need to provide outreach services and activities to families in temporary accommodation, where families can gain access to facilities such as outdoor activities and tumble-tot classes.

7 What do parents and children see to be the biggest gap in the play facilities that are currently available to them?

Comments:

We do not intend to answer this question.

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8 What can we do to make play spaces more appealing – particularly for children aged 8-13?

Comments:

We do not intend to answer this question.

9 How can communities be best involved in the design and running of new play spaces?

Comments:

Children are often excluded from decision-making concerning public spaces and their design, and policy and guidance needs to address the role of children and how best they can be involved in this. Children and young people bring a unique viewpoint, energy and creativity to such processes. Shelter's good practice guide on how RSLs can work with young people^{xvii} recommends the following guidelines, which could be applied for the purpose of involving young people from communities in the design and running of new play spaces:

- Avoid tokenism; any consultation with communities and young people needs to be fully inclusive and accessible.
- Ensure that young people understand what they can and can't influence to avoid disappointment.
- Draw on existing pathways, such as schools and youth groups, to reach young people, but also try to engage those who are not involved with any kind of organisation.
- Decide how young people will benefit from being involved in the consultation. They are giving their time and energy and deserve something back. This may range from information and advice, to organised trips or vouchers.

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In addition, research by the Groundwork Trust^{xviii} recommends improving the skills of planning and regeneration professionals to work with young people effectively in the design of and decision-making concerning places to play.

Work is also currently being developed by Shelter's Good Practice Unit on the role of social landlords as facilitators of community services. Some initial findings have identified good practice in social housing estates of communities providing safe places for children to play. Where there is a lack of safe playing space for children community volunteers have been trained to provide services for children such as after school clubs, play schemes, and designated play areas.

10 What needs to change for parents and children to be less concerned about outside play?

Comments:

We do not intend to answer this question.

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11 Where, when, and by whom should play be supervised, and where should it be unsupervised?

Comments:

We do not intend to answer this question.

12 What further improvements to road safety and accessibility do parents and children want in order to support children's play?

Comments:

We do not intend to answer this question.

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13 How can government and local communities support play through changing negative perceptions of children and young people?

Comments:

Children tend to be portrayed as either victims or troublemakers within policy. Work by the Groundwork Trust found that one of the biggest barriers to involving young people more meaningfully in their communities was local adults' negative attitudes towards them^{xix}. A report by the Children's Play Council and Children's Society consulted children about outdoor play^{xx}. They found the most popular location for outside play was in the street followed by a park near their home or a garden. However, nearly nine out of ten younger children (89%) and almost three-quarters (71%) of the older children had been told off for playing outside^{xxi}.

In addition, work being developed by Shelter's Good Practice Unit on community facilities has identified the use of youth shelters in parks for young people to sit under and socialise. There have been some complaints by other residents using the park that these youth shelters encourage anti-social behaviour. However, when talking to the young people they prefer to use these areas, as they feel safe, in relation to other vicinities of the park. Similarly, the use of shops promotes comparable behaviour. Engagement with communities needs to express and include children's and young people's views concerning the way they use outside space. Policy and guidelines on play should address the needs of the majority young people avoiding the portrayal of them as either victims or troublemakers.

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14 Are worries about being sued leading to play areas that are dull and unstimulating?

Comments:

We do not intend to answer this question.

15 What needs to happen in order for the work we're suggesting on planning to make a difference on the ground?

Comments:

The delivery of appropriate infrastructure for new housing developments is crucial. Infrastructure planning should ensure adequate community facilities including public play spaces are available for new residents. Forthcoming Shelter research on three neighbourhoods in the Thames Gateway^{xxii} has found that residents valued green space but that there was a lack of designated play spaces for children. Further, in one development the section 106 agreement included plans for a new park, but approximately seven years after the residents moved in the scheme is still awaiting completion. We believe that enforcement measures should be implemented to ensure that section 106 agreements are adhered to between local authorities, planners and developers to ensure that the infrastructure, including public play spaces, is adequate for residents.

Plans are discussed in the consultation to work with CLG to firmly embed play in community empowerment policy, including a new duty from April 2009 which will require local authorities to inform, consult and involve local people in decisions, policies and services. Shelter believes this should involve the provision of opportunities for residents to give verbal feedback on plans rather than relying on formal written consultation. It should also include working with existing community

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groups and advice agencies such as Citizens Advice, residents groups and other community based associations.

Planning should be sympathetic to community cohesion policies and apply inclusive practices. Again, the forthcoming Shelter research on the Thames Gateway neighbourhoods found, that, in general, tenants that were socially renting were less satisfied than owner-occupiers with the management company employed. There were concerns and tensions relating to the level of service charges for social tenants.

One of the recommendations from the research is that greater effort is needed to incorporate views of potential residents and those living nearby new developments into the planning/ design stage, and, once a development is up and running. Therefore, encouraging local authorities to apply 'community engagement and empowerment' approaches to the creation of child-friendly public space set out in the consultation must include those groups of people who are often excluded from decision-making, such as non home-owners in temporary or private rented accommodation. It should also include some effort to consult with potential future residents where new developments are planned and such future residents can be identified.

16 What contribution should parents and communities make to support children playing outside?

Comments:

We do not intend to answer this question.

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17 How can we ensure that play is given a high priority by local areas?

Comments:

Shelter believes that the inclusion of play strategies should be incorporated into the following policies, strategies and guidelines to ensure play is given a high priority by local areas:

- Local Area Agreements
- Young people's plans
- Housing/development strategies.

18 What is the specific role of PCTs and primary care professionals in promoting healthy, active play?

Comments:

We do not intend to answer this question

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19 What role should playworkers take in delivering this agenda?

Comments:

We do not intend to answer this question

20 Please use this space for any other comments.

Comments:

No further comments

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21 Please let us have your views on responding to this consultation (e.g. the number and type of questions, was it easy to find, understand and complete etc).

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

E-Mail address for acknowledgement Francesca_Albinese@shelter.org.uk

Here at the Department for Education and Skills we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

ⁱ Evidence was gathered through a postal survey sent to all Heads of Housing and Children's Services in all local authorities. In addition, structured telephone interviews were conducted with Directors and Assistant Directors of children and learners teams in 8 English Regional Government Offices.

ⁱⁱ Prime Ministers Strategy Unit, *Improving the Life Chances of Disabled People*, January 2005.

ⁱⁱⁱ Knight, A. *Holidays, play and disabled children*, Community Care, February 2008.

^{iv} Ibid.

^v Shelley, P. *Everybody here? Play and leisure for disabled children and young people*, Contact a Family, June 2002 .

^{vi} Pertrie, P., Knight, A., Zu Mond, M. and Potts, P. *On Holiday! Policy provision for disabled children and their families*, Institute of Education and Dfes, July 2007

^{vii} Every Disabled Child Matters, *Disabled children and housing*, June 2008

^{viii} Shelter uses the 'bedroom' standard measure of overcrowding.

^{ix} Definition taken from Harker, L., *Chance of a Lifetime*, Shelter, September 2006

^x CLG, Housing Surveys Bulletin, Issue number 1, October 2007.

^{xi} *Home truths*, Shelter, August 2005.

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^{xii} Harker, L., *Chance of a Lifetime*, Shelter, September 2006

^{xiii} Children's Rights Alliance for England, UK implementation of the Convention on the Rights of the Child: NGO alternative report to the Committee on the Rights of the Child – ENGLAND, March 2008, p. 23.

^{xiv} Cullen, S., Hayes, P. and Hughes, L. , *Good practice guide: Working with housed Gypsies and Travellers*, Shelter, January 2008.

^{xv} Hood, S., *Reporting on children in cities: The State of London's Children Reports*, Children, Youth and Environments 14(2), 2004.

^{xvi} Shelter, *Good practice briefing: Engaging with homeless children, Guidance for children centres*, April 2008.

^{xvii} Murphy, J. and Cullen, S., *How registered social landlords can work with young people: A good practice guide*, Shelter, January 2006.

^{xviii} Warpole, K. (2003) *No Particular Place to Go*, Groundwork Trust.

^{xix} Warpole, K. (2003) *No Particular Place to Go*, Groundwork Trust.

^{xx} Children's Play Council and The Children's Society, *Grumpy grown ups stop children's play, Summary report, 2003*.

^{xxi} Ibid.

^{xxii} Bernstock, P., *Neighbourhood Watch*, Shelter, July 2008.